

## DOCKET SECTION

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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
DOCKET NO. R97-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following follow-up interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. Particularly since the Postal Service is encouraging cooperation from the intervenors, I request that similar cooperation in liberally interpreting the requests made by my interrogatories and provide the desired information. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. All responses should be complete without reference to any previous Postal Rate Commission dockets.

November 20, 1997

  
Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-93 In your response to subpart c of DBP/USPS-19, you indicated that the object was to generate as much net revenue as is practicable. Elaborate and explain the meaning of the words "as is practicable."

DBP/USPS-94 Refer to your response to subpart f of DBP/USPS-58. [a] Indicate the approximate percentage of letters that are sampled in this manner. [b] Confirm, or explain if you are unable to do so, that you would be able to confirm my original

interrogatory if I had put the exception you related in your response into my interrogatory. [c] Approximately how many pieces of mail are checked during one of these random checks? [d] Explain any mail delays which are caused by the quality checks related in your response.

DBP/USPS-95 Refer to your response to subpart g of DBP/USPS-58. Approximately what percentage of the mail which meets the specifications shown will be handled by automation?

DBP/USPS-96 Refer to your response to subpart p of DBP/USPS-6. [a] Since the words "to the extent practicable" are included in the rule, why wasn't your response an unqualified yes? [b] Elaborate on the meaning of the words "to the extent practicable."

DBP/USPS-97 Refer to your response to subpart u of DBP/USPS-6. [a] Does this mean that if there was a weather forecast predicting disruptive adverse weather conditions then the Postal Service should make the collection early? [b] Explain your response to subpart a. [c] Out of all of the collection boxes and all of the collection times for each of the boxes throughout all of the country, approximately what percentage of these would have to be collected early in anticipation of disruptive adverse weather conditions? [d] Approximately what percentage would have to be collected early for any other exigent circumstances? [e] Elaborate on what might result in the early collections referred to in subpart d? [f] Are you stating that the collection times of all boxes throughout the country should be changed to 12:01 AM so that in the event that that there was exigent circumstances to collect mail early, such as in anticipation of disruptive adverse winter weather conditions, there would not be a failure for that box by collecting it early? [g] If so, explain how this would meet the conditions of the level of service contemplated by the referenced sections of the POM. [h] If not, provide a meaningful response to subparts t and u which relates to the normal conditions and not to the rare occurrence of some emergency condition.

DBP/USPS-98 Refer to your response to subparts n and o of DBP/USPS-7. [a] For a period of time following the change in delivery standards, did the Postal Service

make a specific request to mailers for suggestions regarding changes in delivery standards? [b] If so, why was this practice stopped?

DBP/USPS-99 Refer to your response to subpart n of DBP/USPS-21. Provide any instances in which a special handling article will receive better handling than a Priority Mail article of a similar destination and characteristics.

DBP/USPS-100 Refer to your response to subpart k of DBP/USPS-33. [a] If the red validating stamp impression was observed to be on a Return Receipt card when it was not properly applied as a genuine postmark, wouldn't that use automatically be considered a violation of the law? [b] If not explain.

DBP/USPS-101 Refer to your response to subpart l of DBP/USPS-37. It appears that only 46% of those claims [3493 divided by 1603] that were filed have been paid by the Postal Service. [a] What were the reasons that the remaining 54% of the claims were not paid? [b] Provide a revised table showing the addition of the following column, "Total Amount Claimed". [c] With respect to a dollar amount of claims requested, what percentage were paid?

DBP/USPS-102 Refer to your response to subpart r of DBP/USPS-68. Please respond to this interrogatory if I were to add the words "the need for the service is greatly" inserted before the word "reduced."

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#### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



David B. Popkin November 20, 1997

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